

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY)	
COMPANY OF AMERICA,)	
)	
Plaintiff,)	
vs.)	CASE NO.: 1:08-cv-50008
)	
YOUNG CONSTRUCTION & PAVING,)	
LLC, KAREN B. YOUNG, GORDON T.)	
YOUNG, JEFFREY D. YOUNG, MONICA L.))	
YOUNG, JOSEPH WELLS, TERRI WELLS,))	
LUKE D. VANDER BLEEK and JOAN L.)	
VANDER BLEEK,)	
)	
Defendants.)	

PROPOSED CASE MANAGEMENT ORDER
REGARDING MOTION FOR PRELIMINARY INJUNCTION

NOW COME the Defendants, YOUNG CONSTRUCTION & PAVING, LLC, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, by their attorneys, BARRICK, SWITZER, LONG, BALSLEY & VAN EVERA, and represents to the Court as follows:

1. Pursuant to Federal Rules of Civil Procedure 26(f), a meeting was held telephonically between STEPHEN G. BALSLEY, as attorney for the Defendants, YOUNG CONSTRUCTION & PAVING, LLC, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG; JAMES M. ALLEN, attorney for the Plaintiff, TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA; and JACK D. WARD, attorney for the Defendants, JOSEPH WELLS, TERRI WELLS, LUKE D. VANDER BLEEK and JOAN L. VANDER BLEEK; on March 5, 2008 for a proposed Case Management Order as to the pending Motion for Preliminary Injunction.

2. The Plaintiff and the Defendants were unable to agree on a discovery plan. The Defendants wish to take three depositions prior to the hearing on the Motion for Preliminary Injunction;

The Defendants, YOUNG CONSTRUCTION & PAVING, LLC, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, propose discovery as follows:

Subject of Discovery:

- Whether the Plaintiff wrongfully induced the Defendants to execute Indemnity Agreements.
- The Defendants believe that three depositions are required.
- The Defendants propose that the depositions be completed within 60 days.

3. The Plaintiff has informed the Defendants that they believe no depositions are required prior to the hearing on the preliminary injunction.

4. The Defendants, YOUNG CONSTRUCTION & PAVING, LLC, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, request the Court for a conference before the Court prior to the entry of a scheduling Order.

5. The Motion of the Preliminary Injunction should be ready for trial within 90 days.

**BARRICK, SWITZER, LONG,
BALSLEY & VAN EVERA**

By:

STEPHEN G. BALSLEY

Stephen G. Balsley - 010481
**BARRICK, SWITZER, LONG,
BALSLEY & VAN EVERA**
6833 Stalter Drive
Rockford, IL 61108
Telephone: 815/962-6611
FAX: 815/962-0687